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9	IN THE UNITED STATES DISTRICT COURT	
10	EASTERN DISTRICT OF CALIFORNIA	
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12	UNITED STATES OF AMERICA,	Case No. 1:23-MC-00086-NODJ
13	Plaintiff,	STIPULATION AND ORDER EXTENDING TIME FOR FILING A COMPLAINT FOR FORFEITURE AND/OR TO OBTAIN AN INDICTMENT ALLEGING FORFEITURE
14	v.	
15	2018 MASERATI GRAN TURISMO, LICENSE NUMBER 8EOX182, VIN:	
16	ZAM45VLA3J0253945 ¹ ,	
17	APPROXIMATELY \$68,119.88 SEIZED	
18	FROM E*TRADE ACCOUNT NUMBER 5147-0717, HELD IN THE NAME OF	
19	VIKEN YEPREMIAN, and	
20	APPROXIMATELY \$71,207.76 SEIZED FROM GOLDMAN SACHS, MARCUS	
21	ONLINE SAVINGS ACCOUNT NUMBER 300007772619, HELD IN THE NAME OF	
22	VIKEN YEPREMIAN,	
23	Defendants.	
24	It is hereby stipulated by and between the United States of America, potential claimants Viken	
25	Yepremian and Sonia Yepremian ("Viken" and "Sonia"), by and through their respective counsel, and	
26	potential claimant and Mardig Yepremian ("Mardig"), appearing in propria persona (collectively	

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"claimants") as follows:

¹ This asset was returned to Viken and Mardig Yepremian in exchange for \$50,250.00 and is the substitutes *res*.

- 1. On or about June 6, 2023, claimants Viken and Sonia filed claims in the administrative forfeiture proceeding with the Federal Bureau of Investigation ("FBI") with respect to the Approximately \$71,207.76 seized from Goldman Sachs, Marcus Online Savings account number 300007772619, held in the name of Viken Yepremian and Approximately \$68,119.88 seized from E*Trade account number 5147-0717, held in the name of Viken Yepremian which were seized on March 10, 2023. Claims were filed by Viken and Mardig on or about June 6, 2023, in the administrative forfeiture proceeding with the FBI with respect to the 2018 Maserati Gran Turismo, License Number 8EOX182, VIN: ZAM45VLA3J0253945, which was seized on March 16, 2023 (hereafter collectively the "defendant assets").
- 2. The FBI has sent the written notice of intent to forfeit required by 18 U.S.C. § 983(a)(1)(A) to all known interested parties. The time has expired for any person to file a claim to the defendant assets under 18 U.S.C. § 983(a)(2)(A)-(E), and no person other than claimants have filed a claim to the defendant assets as required by law in the administrative forfeiture proceeding.
- 3. Under 18 U.S.C. § 983(a)(3)(A), the United States is required to file a complaint for forfeiture against the defendant assets and/or to obtain an indictment alleging that the defendant assets are subject to forfeiture within ninety days after a claim has been filed in the administrative forfeiture proceeding, unless the court extends the deadline for good cause shown or by agreement of the parties. That deadline was September 4, 2023.
- 4. By Stipulation and Order filed August 30, 2023, the parties stipulated to extend to November 30, 2023, the time in which the United States is required to file a civil complaint for forfeiture against the defendant assets and/or to obtain an indictment alleging that the defendant assets are subject to forfeiture.
- 5. By Stipulation and Order filed November 8, 2023, the parties stipulated to extend to February 28, 2024, the time in which the United States is required to file a civil complaint for forfeiture against the defendant assets and/or to obtain an indictment alleging that the defendant assets are subject to forfeiture.
- 6. By Stipulation and Order filed February 27, 2024, the parties stipulated to extend to May 28, 2024, the time in which the United States is required to file a civil complaint for forfeiture against the

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defendant assets and/or to obtain an indictment alleging that the defendant assets are subject to forfeiture. 1 7. By Stipulation and Order filed May 13, 2024, the parties stipulated to extend to October 2 25, 2024, the time in which the United States is required to file a civil complaint for forfeiture against the 3 defendant assets and/or to obtain an indictment alleging that the defendant assets are subject to forfeiture. 4 8. By Stipulation and Order filed October 23, 2024, the parties stipulated to extend to 5 February 28, 2025, the time in which the United States is required to file a civil complaint for forfeiture 6 against the defendant assets and/or to obtain an indictment alleging that the defendant assets are subject 7 to forfeiture. 8 9. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to extend to May 9 29, 2025, the time in which the United States is required to file a civil complaint for forfeiture against the 10 defendant assets and/or to obtain an indictment alleging that the defendant assets are subject to forfeiture. 11 10. Accordingly, the parties agree that the deadline by which the United States shall be required 12 to file a complaint for forfeiture against the defendant assets and/or to obtain an indictment alleging that 13 the defendant assets are subject to forfeiture shall be extended to May 29, 2025. 14 15 Dated: February 18, 2025 MICHELE BECKWITH Acting United States Attorney 16 17 /s/ Kevin C. Khasigian By: KEVIN C. KHASIĞIAN 18 Assistant United States Attorney 19 20 /s/ Alaleh Kamran Dated: February 18, 2025 ALALEH KAMRAN 21 Attorney for potential claimants Viken Yepremian and Sonia Yepremian 22 (Signature approved by email) 23 24 Dated: February 18, 2025 /s/ Mardig Yepremian MARDIG YEPREMIAN 25 Potential Claimant Appearing in propria persona 26 9544 N. Larkspur Avenue Fresno, CA 93720 27 (Signature retained by attorney) 28

IT IS SO ORDERED.

Date: February 19, 2025

TROY L. NUNLEY

CHIEF UNITED STATES DISTRICT JUDGE